

# YELLOW JUG OLD DRUGS PROGRAM<sup>®</sup>

Great Lakes Clean Water Organization  
3681 Trask Lake Rd.  
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TO: Michigan Legislature

FR: Board of Directors, Great Lakes Clean Water Organization

RE: Support of HB 5798

Great Lakes Clean Water Organization, a non-profit 501 (c) 3 organization was founded in January 2009. Our goal is to promote safe and approved collection and disposal of unused/unwanted drugs to help keep our water clean. We started the Yellow Jug Old Drugs program in April 2009. The program is available in Michigan, Illinois and Wisconsin. In July 2012 The Michigan Department of Environmental Quality recently awarded the Yellow Jug Old Drugs program a \$77,125 grant through the Michigan Community Pollution Prevention (P2) Grant Program for the development of ongoing household drug collection programs.

Currently there are 225 pharmacies participating in Michigan. Participating pharmacies are located in almost every county in Michigan. More information including a participating pharmacy location map is available at [www.greatlakescleanwater.org](http://www.greatlakescleanwater.org)

Since the initial stages of research and planning to the present we have been in communication with DEQ solid waste and air quality staff and other agency staff to ensure that we are in compliance with all state, Federal and local regulations.

One of the Solid Waste regulations we must comply with is the import/export of solid waste between counties. Complying with the import/export regulation adds additional costs to our program but since that regulation is in place we do comply. Other programs and law enforcement, especially those in central and northern Michigan, may find it difficult to comply with the regulation if they want to take drug waste collected to one of the three licensed, approved incinerators in Michigan because the counties that are approved to import solid waste to the incinerators are limited per county solid waste plans.

In September of 2010 an issue surfaced relating to drug waste collection. A drug collection event was held in Lansing on the grounds of the Capitol Building. Shortly after that there were some questions raised regarding whether drug collection at events and sites such as pharmacies and law enforcement agencies were in full compliance of the solid waste regulations. There was some question as to whether these sites should technically be considered a transfer station, type b. Part 115 of the solid waste regulations requires transfer stations to be listed and approved in each county solid waste plan.

We understand that House Bill 5798 would provide regulatory guidance for programs such as ours that work in partnership with local pharmacies while exempting these locations from the above referenced Solid Waste Regulations. For this reason we support this legislation.

Chris Angel, President Great Lakes Clean Water Organization  
Diane O'Connor, Treasurer Great Lakes Clean Water Organization  
Michelle Martell-Glazier, Secretary Great Lakes Clean Water Organization